

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Dennis Dela Cruz Fabian

: NO. 20-11120-AMC

: CHAPTER 13

Response to Motion for Relief filed by Weichert Financial Services

Debtor, by and through her attorney, responds as follows:

1-2. Admitted.

3-11. Denied. Movant is adequately protected and the real estate is necessary for a successful reorganization. Further, debtor is in the middle of a mortgage modification application.

WHEREFORE, it is respectfully requested that the Motion be DENIED.

By: /S/Michael P. Kelly